

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

JOHN DUGAN, AURORA DUGAN and
MATTHEW TAPSCOTT, each individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

LLOYDS TSB BANK, PLC,

Defendant.

No. C 12-02549 WHA

and

No. C 12-02937 WHA

DAVID T. OSMENA and PATRICIA
HOGAN-OSMENA, husband and wife,
and on behalf of all others similarly situated,

Plaintiffs,

v.

LLOYDS TSB BANK, PLC, a bank
organized and existing under the laws of
the United Kingdom,

Defendants.

**COURT-ORDERED
INTERROGATORIES
AND FOLLOW-UP**

As a result of the discussion at today's hearing, the Court now **ORDERS** Lloyds to answer
under oath the following interrogatories:


1. Describe all loan products or programs by Lloyds or its affiliates at
any time since January 1, 1990, that utilized, at least as an optional provision, a
cost-of-funds clause.

2. Describe all loan products or programs by Lloyds or its affiliates at any time since January 1, 1990, that utilized a principal-cap provision.

These questions are not limited to dual-currency products or programs. Due diligence and good-faith investigation must be used in answering so that the answer can be relied on in making important decisions. Qualifiers like “to my knowledge” should not be used. The answers must be under oath and served by **NOON ON JANUARY 31, 2013**. The answers should state in full the extent of the investigation and due diligence. Thereafter, plaintiffs’ counsel may promptly take follow-up discovery to verify and test the answers.

IT IS SO ORDERED.

Dated: January 10, 2013.



WILLIAM ALSUP
UNITED STATES DISTRICT JUDGE